

Remarks

Claims 6, 7, 10-32 are pending. New claims 31 and 32 have been added. Support for the new claims can be found, for example, on page 4, lines 10-20, and page 15, lines 18-30. No new matter has been added.

Rejection of Claims under 35 U.S.C. § 103

Claims 6, 7, and 10-30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Jeske, U.S. Patent No. 5,974,443 in view of Greer et al., U.S. Patent No. 6,247,048, and further in view of Tan et al., U.S. Patent No. 6,314,469 (Tan). The applicant respectfully traverses these rejections.

Jeske, Greer, and Tan taken alone or in combination neither teach nor suggest a method for processing requests from a computer network including:

determining a character set, the character set including the character set used by the requesting computer, wherein the determining further comprises:

receiving a predefined character from the requesting computer;

reading a table, the table including a plurality of character codes and corresponding language codes; and

matching the predefined character to one of the plurality of character codes, the matching determining one of the plurality of language codes;

as required by independent claim 6.

Regarding the receiving a predefined character from the requesting computer, the Examiner refers to column 6 of Greer, which states in relevant part:

The mobile computing devices 351 and 357 may use the same or different character sets. When one of the mobile computing devices 351 or 357 opens a communication session with the proxy server 340, the mobile computing device informs the proxy server 340 as to what type of character set the computing device uses. This session character set is registered in the proxy server 340 such that all subsequent communication between the proxy server 340 and the mobile computing device is in the specified character set. Thus, when a mobile computing device communicates with an Internet server through the proxy server 340, the character set transcoder 345 encodes data from the Internet server into the character set used by the mobile computing device.

At 420, the mobile computing device issues an HDTCP GET request. The GET request often specifies a URL that the client device wishes to access. The GET request may also specify a character set that should be used when the proxy server responds to the get request. (Column 6, lines 7-20 and 60-64)

Thus, while Greer does teach that a device “informs the proxy server 340 as to what type of character set the computing device uses,” it neither teaches nor suggests that the proxy server 340 receives “a predefined character” within the meaning of the term as used in the present application.

Regarding the “reading a table, the table including a plurality of character codes and corresponding language codes” and the “matching the predefined character to one of the plurality of character codes, the matching determining one of the plurality of language codes,” the Examiner refers to columns 12-13 of Tan which state in relevant part:

As shown in FIG. 4, the process of identifying an encoding type 401 begins at 403 with the system identifying the digital sequence of the top-level domain of the domain name. In the system in place in March 1999, the top-level domains included .com, .edu, .gov, .mil, .org, .int, .net, and the various two letter country designations (e.g., .fr, .sg, .kr, etc.).

After the digital sequence of the top-level domain has been identified, the system next matches that sequence to a particular encoding type. In a preferred embodiment, this involves matching the sequence against records in a mapping table at 405. (Column 12, lines 27-38).

Thus, while Tan does teach using top level domain information to determine a particular coding type, Tan neither teaches nor suggests using “a predefined character” within the meaning of the term as used in the present application.

Additionally regarding the combination of Tan and Jeske, the Examiner states:

It would be obvious . . . to modify Jeske in view of Tan so that a mapping table is used to identify the corresponding encoding type of known digital sequences or characters. One would be motivated to do so to speed the search for a matching linguistic encoding type. (Office Action of January 16, 2004, p. 4, ¶2)

The applicant respectfully disagrees. The applicant respectfully submits that the Examiner has failed to establish a *prima facie* case of obviousness. In addition to the

claim elements not taught or suggested by the cited references as described above, the Examiner has not shown that there is some suggestion or motivation to combine Jeske and Tan, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. Neither reference suggests such a combination. Moreover, the applicant respectfully submits that the Examiner has failed to explain what specific understanding or technological principle within the knowledge of one of ordinary skill in the art would have suggested the combination, as required by, for example, *In re Rouffet*, 47 USPQ2d 1453 (Fed. Cir. 1998).

First, there is noting in Jeske teaching or suggesting the need to determine a “linguistic encoding type”, and so one of ordinary skill in the art would have no motivation to find a faster way to determine a linguistic encoding type. Second, there is nothing in Tan supporting the Examiner’s position that Tan teaches a mechanism “to speed the search for a matching linguistic encoding type.” Third, assuming for the sake of argument that the combination of Jeske and Greer is proper (and the applicant does not concede this point), there would be no motivation to look to Tan for a mechanism “to speed the search for a matching linguistic encoding type” because Greer teaches directly informing the proxy server as to what type of character set the computing device uses.

Regarding the combination of Jeske and Greer, the Examiner continues to argue that “[i]t would have been obvious . . . to modify Jeske in view of Greer so that character set transformation is affected. One would be motivated to do so to allow universally located clients access to hosted data in a network.” Office Action of January 16, 2004, p. 3, ¶2. The applicant continues to submit that the Examiner has failed to establish a *prima facie* case of obviousness. The Examiner has not shown that there is some suggestion or motivation to combine Jeske and Greer, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. Neither reference suggests such a combination, and the Examiner has failed to explain what specific understanding or technological principle within the knowledge of one of ordinary skill in the art would have suggested the combination. The Examiner’s purported reason for combination, “to allow universally located clients access to hosted data in a network,” can be adequately satisfied or achieved taking either reference alone, and thus there is no real motivation to combine the references.

In response to a similar line of argument presented by the applicant in his Response of October 17, 2003, the Examiner states:

In this case, Jeske and Greer references deal with Internet access systems and specifically the background of Jeske discusses the problem of accessing information not resident at the HTTP server that receives the request from the client and addressing the problem of retrieving content that differs in format than that of the HTTP server content. (Office Action of January 16, 2004, p. 7, ¶2)

First, assuming for the sake of argument that the Examiners characterization of Jeske is accurate (and the applicant does not concede this point), the mere fact that both references “deal with Internet access systems” is not sufficient motivation to combine the references. Second, the purported problem of Jeske (accessing information not resident at the HTTP server that receives the request and retrieving content that differs in format than that of the HTTP server content) provides no motivation or suggestion to seek out techniques for transcoding data into the appropriate character set, as discussed by Greer. Finally, the Examiner continues to ignore the applicant’s initial response to the Examiner’s primary argument for the combination.

Accordingly, the applicant respectfully submits that claim 6 is allowable over Jeske, Greer, and Tan taken alone or in combination. Claims 7 and 31-32 depend from claim 6 and are allowable for at least this reason.

Regarding independent claims 10, 22, and 23, the applicant respectfully submits that Jeske neither teaches nor suggests a method for processing requests from a computer network including:

receiving a data stream from the computer network;
style="padding-left: 40px;">identifying a template within the data stream; [and]
style="padding-left: 40px;">searching a registration table, the searching programmed to locate department logic corresponding to the template;

as required by independent claim 10, and generally required by independent claims 22 and 23.

Regarding the applicant’s claim limitations, the Examiner refers generally to

column 3-5 of Jeske and states “Jeske discloses a browser request is received by a CGI process on the server and using a virtual application process 107, an HTML template is defined and populated with data to form a responsive web page.” Office Action of January 16, 2004, p. 4, ¶7. The Examiner further states that “Jeske discloses that the template file is received at the gateway 106, merged with the corresponding data and sent to the browser (see col. 4, lines 1-10).” Office Action of January 16, 2004, p. 7, ¶3.

The applicant respectfully disagrees. Column 3, line 60 through column 4, line 4 state:

The dynamic capability of this system is that the virtual application 107 defines an HTML template file. An HTML template file is an HTML document that has defined specific areas in the document that will be dynamically filled in. For example, there are places in the document that will contain account balances, dates, times, or names. These positions are clearly marked in the template file so that they can be populated by this dynamic data. The template file resides on the agent platform or node. Thus, any dynamic data that comes from the host or the database, is merged by data gateway 106 with the template file and then sent out back to the browser.

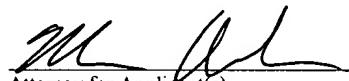
Thus, the cited portion of Jeske does not teach or suggest that the template file is received at the gateway 106. The template file resides on the agent platform which includes gateway 106 (See Figures 1 and 2). Moreover, there is no teaching or suggestion that Jeske’s template is received as part of a data stream from a computer network or identified within that data stream, as the applicants claim.

There is also nothing in Jeske teaching or suggesting that a registration table be searched to locate department logic corresponding to the template. In fact, the Examiner makes no effort to identify something from Jeske that teaches or suggests this limitation. Instead, the Examiner argues that “[i]t would be obvious . . . to modify Jeske by specifying department logic in place of the application process since the same functionality is achieved.” Office Action of January 16, 2004, p. 6, ¶1. The Examiner provides no support for his conclusion that “department logic” and “the application process” in any way represent the same functionality. Moreover, the Examiner has failed to explain what specific understanding or technological principle within the knowledge of one of ordinary skill in the art would have suggested this conclusion.

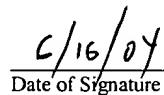
Accordingly, the applicant respectfully submits that independent claims 10, 22, and 23 are allowable over Jeske. Claims 11-21 depend from claim 10 and are allowable for at least this reason. Claims 24-30 depend from claim 23 and are allowable for at least this reason.

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA, 22313-1450, on June 16, 2004.



Attorney for Applicant(s)


Date of Signature

Respectfully submitted,



Marc R. Ascolese
Attorney for Applicant(s)
Reg. No. 42,268
512-439-5085
512-439-5099 (fax)